

## MEMORANDUM ENDORSED

### BACHNER & ASSOCIATES, P.C.

ATTORNEYS AT LAW  
111 BROADWAY  
SUITE 701  
NEW YORK, NEW YORK 10006

TELEPHONE: (212) 344-7778

FACSIMILE: (212) 344-7774

[www.bhlawfirm.com](http://www.bhlawfirm.com)

MICHAEL F. BACHNER\*  
\*ALSO ADMITTED IN NJ

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 7/24/2023

NEW JERSEY OFFICE  
18 METZGER DRIVE  
WEST ORANGE, NJ 07052

July 24, 2023

#### VIA ECF

Hon. Gregory H. Woods  
US District Court Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

**Re: USA v. Dupont, et. al. (Paul Feldman), 23 Cr. 320 (GHW)**

Dear Judge Woods:

My office represents Dr. Paul Feldman in connection with the above-referenced matter. On July 10, 2023, Your Honor granted Dr. Feldman's application to travel with his family to Denmark and Croatia from August 1 through August 12, 2023 (ECF Docket Entry 21). Today, the Clerk's Office requested clarification of the terms of the proposed bond. Accordingly, with the consent of AUSA Sarah Mortazavi, I respectfully request that Dr. Feldman's bail conditions be modified as follows. Dr. Feldman's original bail conditions shall remain unchanged. A separate bond in the amount of \$500,000.00, signed by the defendant, and fully secured by \$500,000.00 cash, shall be posted to secure his travel to Europe. Upon his return to the U.S., the \$500,000.00 bond shall be extinguished and the funds securing his bail shall be fully returned to him. Dr. Feldman's passport shall be returned to him and returned to Pretrial Services within 48 hours of his return to the U.S. Dr. Feldman will provide his full itinerary to Pretrial Services prior to embarking.

Should the Court have any questions, we stand ready to assist. Thank you for your courtesy in this and all other matters.

Respectfully,


/s/ *Michael Bachner*

Michael F. Bachner

The conditions of Dr. Feldman's pretrial release are modified as follows: The defendant may travel from the United States to Denmark and Croatia during the period between August 1 and August 12, 2023. Pretrial services may release the defendant's passport to him to permit this authorized travel. The defendant must provide a detailed itinerary for his travel to pretrial services. The defendant may not deviate from that itinerary. The defendant must contact pretrial services no later than 24 hours following his return to the United States and must return his passport to pretrial services within 48 hours following his return. As offered by the defendant, the defendant must post a separate \$500,000 cash bond to secure his travel to Europe. Upon his return to the United States and the return of his passport to pretrial services, the \$500,000 bond shall be extinguished and the funds securing that bond shall be returned to him. For the avoidance of doubt, no interest or other return shall accrue to the benefit of the defendant on any funds posted to secure that bond. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 35.

SO ORDERED.

Dated: July 24, 2023  
New York, New York

  
GREGORY H. WOODS  
United States District Judge